

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

ContentGuard Holdings, Inc.,

Plaintiff,

vs.

Amazon.com, Inc.; Apple Inc.; BlackBerry
Limited (fka Research in Motion Limited) and
BlackBerry Corporation (fka Research in
Motion Corporation); HTC Corporation and
HTC America, Inc.; Huawei Technologies Co.,
Ltd. and Huawei Device USA, Inc.; Motorola
Mobility LLC; Samsung Electronics Co., Ltd.,
Samsung Electronics America, Inc., and
Samsung Telecommunications America, LLC,

Defendants,

and

DirecTV, LLC,

Intervenor.

No. 2:13-cv-01112-JRG

**APPLE INC.'S NOTICE OF JOINDER TO DEFENDANTS' RESPONSE TO
PLAINTIFF CONTENTGUARD HOLDINGS, INC.'S SUPPLEMENTAL
SUBMISSION IN SUPPORT OF ITS MOTION TO STRIKE
DEFENDANTS' JOINT INVALIDITY CONTENTIONS**

Defendant Apple Inc. (“Apple”) hereby gives notice that it joins Defendant Google Inc.’s and Defendants Motorola Mobility LLC, HTC Corporation, HTC America, Inc., Huawei Technologies Co., LTD, Huawei Device USA, Inc., Samsung Electronics Co. LTD., Samsung Electronics America, Inc., Samsung Telecommunications America, Inc., Blackberry Corp., and Blackberry Limited’s Response to Response to Plaintiff ContentGuard Holdings, Inc.’s Supplemental Submission in Support of its Motion to Strike Defendants’ Joint Invalidity Contentions (Dkt. No. 277) and Amazon’s Response to Plaintiff ContentGuard Holdings, Inc.’s Supplemental Submission in Support of its Motion to Strike Defendants’ Joint Invalidity Contentions (Dkt. No. 284). For the reasons stated therein, and as explained more fully in Defendants’ Motion to Adopt a Modified Version of General Order No. 13-20 Focusing Claims and Prior Art (Dkt. No. 202) and in Defendants’ Opposition to Plaintiff’s Emergency Motion to Strike Defendants’ Joint Invalidity Contentions (Dkt. No. 206), Apple respectfully requests that the Court deny ContentGuard’s Motion to Strike Defendants’ Joint Invalidity Contentions.

November 17, 2014

Respectfully submitted,

By: /s/ Bryan K. Anderson

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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this document was served on all counsel who have consented to electronic service on November 17, 2014. *See* Local Rule CV-5(a)(3)(A).

/s/ Melissa Smith